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February 2, 2007

**VIA EMAIL AND HAND DELIVERY**

The Honorable Vincent J. Poppiti  
Blank Rome LLP  
1201 Market Street, Suite 800  
Wilmington, DE 19801

**Re:** *LG.Philips LCD Co., Ltd. v. ViewSonic Corp., et al.*, C.A. No. 04-343-JJF

Dear Special Master Poppiti:

This letter responds to the letter from LG.Philips LCD Co., Ltd. (“LPL”) requesting the Special Master set deposition dates for Tatung Company and Tatung Company of America (collectively, the “Tatung defendants”) witnesses without completing the meet and confer process.

LPL reports in its letter and certification that the Tatung defendants have refused to “resume discussions concerning depositions and scheduling” and “refus[ed] to cooperate.” In fact, contrary to LPL’s assertions, the Tatung defendants agreed with LPL on the location of the depositions and offered in writing to make their witnesses available at that location, at their expense, and on mutually convenient dates. In addition, the Tatung defendants have identified for LPL who will serve as their 30(b)(6) witnesses. The only caveat offered was that the Tatung Company witnesses, who are all Taiwanese and reside in Taiwan, would not be available until after the Lunar New Year (February 18-25, 2007), which is a recognized Asian holiday.

LPL also states in its letter that “Defendants have since refused to confirm a future meet and confer date....” This is not correct.

On January 26, 2007, LPL unilaterally re-noticed the depositions of Tatung Company’s and Tatung Company of America’s 30(b)(6) depositions for Delaware rather than Los Angeles as previously stipulated. Notably absent from LPL’s Appendix A are any deposition dates for the LPL witnesses. At the Tatung defendants’ suggestion, LPL and Tatung attorneys met and conferred on locations and dates, agreed on locations and are clearing dates. The parties have also agreed on the locations for the LPL depositions and are now waiting for LPL to provide dates for those depositions.

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The Tatung defendants submit that this motion is premature and should not be determined unless the parties are unable to agree on dates.

Respectfully,



Anne Shea Gaza  
(#4093)

ASG/afg

cc: Clerk of the Court (via hand delivery)  
Richard D. Kirk, Esquire (via electronic mail & hand delivery)  
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